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Attorneys for Defendant Qwest Corporation

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

NICKOLAS FACAROS,

Case No. 10-6343-HO

Plaintiff,

v.

QWEST CORPORATION, a Colorado
Corporation,

Defendant.

**DEFENDANT'S MOTION FOR
PROTECTIVE ORDER STAYING ALL
DISCOVERY**

Pursuant to Local Rule 7.1(a), defendant, Qwest Corporation ("Qwest"), certifies that the parties made a good faith effort through telephone conferences to resolve the dispute but have been unable to do so.

Pursuant to Federal Rules of Civil Procedure 26(c), Qwest moves this Court for a protective order staying all discovery, including response to plaintiff's pending discovery

**1- DEFENDANT'S MOTION FOR PROTECTIVE
ORDER STAYING ALL DISCOVERY**

13141-0856/LEGAL20318033.1

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requests, in this matter pending resolution of Qwest's Motion to Dismiss, filed concurrently herewith.

This Motion is supported by the pleadings and the concurrently filed supporting Memorandum of Law and Declaration of Sarah J. Crooks.

DATED: March 7, 2011

Respectfully submitted,

PERKINS COIE LLP

By: s/ Sarah J. Crooks

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2- DEFENDANT'S MOTION FOR PROTECTIVE
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